

WD-17J

AUG 02 1995

Robert M. Krill, Director
Bureau of Water Supply
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707

Dear Mr. Krill:

Representatives of the United States Environmental Protection Agency (USEPA), Region 5, met with the staff from various offices of the Wisconsin Department of Natural Resources (WDNR) including the Bureau of Water Supply and the Southeast District Office on May 1-2, 1995, to conduct a Mid-Year Evaluation of your Agency's Underground Injection Control (UIC) program. During the review, the Region focused primarily on those actions which occurred since the Fiscal Year (FY) 1994 End-of-Year Evaluation.

Enclosed is a copy of the Final Report which highlights the major findings of the oversight team.

In general, we were very pleased to find that the WDNR continues to implement a high quality UIC program. The issues identified reflect areas where actions should be considered at this time, including the inspection and potential closure of wells receiving industrial fluids which threaten Wisconsin's drinking water sources.

We continue to support the ongoing efforts by the State's UIC program manager to develop an injection well inventory, data base and Class 5 outreach program. The Region has continued to be supportive of the State's efforts to implement a storm water permitting program which will ultimately cover storm water drainage injection wells.

As discussed at the close-out session of the evaluation, we look forward to devising new ways to enhance our partnership with your agency.

If we can be of assistance to you, or if you have any questions about our findings, please contact Charles Anderson of my staff at (312) 886-1501.

Sincerely yours,

Richard J. Zdanowicz, Chief
Underground Injection Control Section

Enclosure

cc: Richard Roth, WDNR
Robert Baumeister, WDNR

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**Wisconsin Department of Natural Resources
Underground Injection Control
Mid-Year Evaluation**

Final Report

In 1983, primacy was granted to the Wisconsin Department of Natural Resources (WDNR) for the regulation of Class I through 5 injection wells. The Fiscal Year (FY) 1995 Mid-Year review of WDNR's Underground Injection Control (UIC) program was conducted during the week of May 1-2, 1995. During the course of the review, Region 5 Staff visited the WDNR Central Office in Madison, WDNR's Southeast District office in Milwaukee and the Wisconsin Department of Industry, Labor and Human Relations (DILHR) Office in Waukesha. The current inventory of injection wells under WDNR's jurisdiction include;

560	Storm water injection wells,
160	Automotive liquid waste disposal wells,
1009	Large wastewater disposal wells,
17	Industrial/Commercial disposal wells,
7	Recharge wells,
22	Miscellaneous injection wells,
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1775	TOTAL
421	Abandoned drinking water wells have also been entered into the States well data base for future reference.

By this review process with the State's staff members, the participants can evaluate the progress that has been made in the regulation of injection wells in the State of Wisconsin. A summary of findings of the review follows:

United States Environmental Protection Agency Participants

John Taylor, Chief, Program Management Unit

Jeff McDonald, Enforcement Unit

Charles Anderson, Program Management Unit

Wisconsin Department of Natural Resources Participants

Robert Krill, Director, Bureau of Water Supply

Robert Baumeister, Chief, Public Water Section, Bureau of Water Supply

Richard Roth, UIC Coordinator, Bureau of Water Supply

Sharon Schaver, Hydrologist, Southeast* District Office

Harold Stanlick, Environmental Engineer, DILHR

Jerry Rodenberg, Wastewater Engineer, WDNR Central Office

Terry Evanson, Hydrologist, WDNR Central Office

**Wisconsin Department of Natural Resources
Underground Injection Control
Mid-Year Evaluation**

Final Report

On May 1-2, 1995, Region 5 staff visited the Wisconsin Department of Natural Resources (WDNR) Central Office in Madison and the Southeast District Office in Milwaukee to evaluate the State's Underground Injection Control (UIC) Program. The review focused on a broad range of UIC related issues including program administration, injection well inventory, UIC legislative issues and enforcement.

Regional staff found that WDNR has continued to expand and improve the effectiveness of the State's program. The State's UIC Coordinator has continued to be an effective manager of the State's UIC program through his many creative approaches including the integration of the UIC effort with a number of other programs in a holistic approach to groundwater protection. The WDNR program has one of the best outreach/public awareness programs in the Nation and promotes coordination with the other WDNR Bureaus and the State Agencies. We anticipate that the Wisconsin UIC program will continue to improve during the second half of the Fiscal Year (FY) 1995.

Generally, the Region is pleased with the efforts put into Wisconsin's UIC program and the priority given to the program by the State. Among the notable program accomplishments during FY 1995 are the on-going county by county injection well inventory effort and the continued effective working relationship with the Wisconsin Department of Industry, Labor and Human Relations. Our visit has confirmed that the two agencies are working together to develop environmentally safe alternatives to injection wells for many new industrial facilities. The two Wisconsin Agencies have also worked together to create a phased approach to nitrate compliance for septic systems.

The Region has been very supportive during the past several years of the development of the WDNR's comprehensive storm water injection well permitting system. The WDNR has contacted the affected communities informing them that if they are going to continue the use of these injection wells, the community will be required to apply for a variance from current State rules. We will be in close contact with you to determine how many communities actually apply for a variance by the deadline of the end of the 1995 calendar year and we will be happy to assist you in any way in addressing the requests.

Region 5 also continues to support the WDNR's Southeast District Office pilot project to locate automotive drainage wells and refer them to the WDNR Solid and Hazardous Waste Program for

follow-up inspections. These inspections should result in the closure and possible remediation of endangering wells.

Currently, 21 wells have been identified and referred to the Solid and Hazardous Waste Program. As mentioned during the Mid-Year Visit, Region 5 will be available to assist on selected inspections so long as sufficient lead time is provided.

Both USEPA and the WDNR have expressed the logic of having a strong outreach program, especially when communicating with Class V operators. Some of the creative outreach techniques that the WDNR has employed to date include: supplying information for plumbing refresher courses, hiring LTES to work on outreach and creating incentives for vulnerability assessments (Wellhead protection surveys).

Despite the tremendous progress that the Wisconsin UIC program has made, there remain some difficult Class 5 issues, not unique to Wisconsin, which will continue to require our mutual attention. The most significant of these is the need to close industrial and automotive disposal wells which have a high potential for endangering groundwater supplies. The State has been a leader in developing cooperative approaches between agencies and programs to avoid the development of such wells in the future. However, there remains a large number of existing wells which ultimately will need to be addressed. It is important that our agencies continue to work together to find ways of addressing these wells.

In conclusion, we feel your UIC program continues to make excellent progress and we look forward to your continued progress during the remainder of FY 1995.